

Kenneth B. Wilson, Calif. Bar No. 130009  
KWilson@perkinscoie.com  
PERKINS COIE LLP  
Four Embarcadero Center, Suite 2400  
San Francisco, CA 94111-4131  
Telephone: 415.344.7000  
Facsimile: 415.344.7050

Attorneys for Defendant  
SIMMONS BEDDING COMPANY  
and Defendant and Counterclaimant DREAMWELL, LTD.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

ZINUS, INC. a California Corporation,  
Plaintiff,

v.

SIMMONS BEDDING COMPANY, a  
Delaware corporation, and DREAMWELL,  
LTD., a limited liability company of  
Nevada,

Defendants.

Case No. 07-CV-03012-PVT

**SUPPLEMENTAL DECLARATION OF  
KENNETH B. WILSON IN SUPPORT OF  
DREAMWELL'S CLAIM CONSTRUCTION  
BRIEF IN RESPONSE TO COURT'S  
INTERIM ORDER**

**Date:** February 19, 2008  
**Time:** 10:00 a.m.  
**Before:** The Honorable Patricia V. Trumbull  
**Location:** Courtroom 5

**AND RELATED COUNTERCLAIMS**

I, Kenneth B. Wilson, declare:

1. I am an attorney with the law firm of Perkins Coie LLP, counsel of record for defendant and counterclaimant Dreamwell, Ltd. ("Dreamwell"). I have personal knowledge of the facts set forth in this Declaration and can testify competently to those facts.

2. Attached to this Declaration as Exhibit 1 is a true and correct copy of U.S. Patent No. 3,611,524 (the "Broyles Patent").

